

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

PACNET SERVICES LTD.,

Plaintiff-in-Interpleader,

v.

OFFICE OF FOREIGN ASSETS CONTROL of the
UNITED STATES DEPARTMENT OF TREASURY;
and JOHN DOE DEFENDANTS 1–73,

Defendants/Claimants-in-Interpleader.

Civil Action No. 17-cv-6027 (NGG) (LB)

**NOTICE OF INTERNATIONAL PAYOUT SYSTEMS, INC.’S
MOTION TO INTERVENE**

International Payout Systems, Inc. (“i-payout”) respectfully moves for leave to intervene and file a responsive pleading in this action under Federal Rule of Civil Procedure 24(a), or alternatively under Rule 24(b). As demonstrated by the accompanying Memorandum of Law, intervention is proper because i-payout has moved to intervene in a timely manner, and i-payout has a direct and substantial financial interest in the interpleader funds that are the subject of the action. If i-payout is not permitted to intervene, i-payout’s financial interest will be impaired by an adverse distribution of the interpleader funds, and the existing parties to the action cannot protect i-payout’s interest.

In further support of its Motion to Intervene, i-payout submits herewith an accompanying Memorandum of Law.

Dated: December 21, 2017

Respectfully submitted,

/s/ Gabrielle Levin

Gabrielle Levin

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filings (NEF). I further certify that paper copies of the foregoing document were served by U.S. mail on the United States Treasury Office, Office of Foreign Asset Control, Treasury Annex, 1500 Pennsylvania Avenue, NW, Washington, DC 20220 on December 21, 2017.

/s/ Gabrielle Levin

Gabrielle Levin